

# **EXHIBIT 31**

IN THE UNITED STATES COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

~~~~~

IN RE: NATIONAL PRESCRIPTION MDL NO. 2804  
OPIATE LITIGATION

Case No. 17-mdl-284  
Judge Dan Polster

This document relates to:  
The County of Summit, Ohio, et al.,  
V.  
Purdue Pharma L.P., et al.,  
Case No. 1:18-OP-45090 (N.D. Ohio)

~~~~~

Videotaped deposition of  
DOUGLAS A. SMITH, M.D., DFAPA  
November 16, 2018  
9:08 a.m.

Taken at:  
Jackson Kelly PLLC  
50 South Main Street Street  
Akron, Ohio  
Wendy L. Klauss, RPR

1 to another substance.

2 Q. So if I understand you correctly, a  
3 healthcare provider who is looking face-to-face  
4 with a patient, trying to render a medical  
5 judgment, has the advantage of being able to  
6 examine that individual, ask questions of that  
7 individual, and better inform their prescribing  
8 decision; is that fair?

9 MR. KEARSE: Object to form.

10 A. Yeah. There is a doctor-patient  
11 discussion to determine risks.

12 Q. But that process will not perfectly  
13 predict outcomes, correct?

14 A. Correct.

15 Q. That's impossible?

16 MR. KEARSE: Object to form.

17 A. Yeah. Medical science doesn't have  
18 an exact test yet.

19 Q. Now, just to go back quickly on the  
20 question of addiction science. You're not  
21 board certified in it. Have you ever received  
22 any specific training in addiction medicine?

23 A. I mean, in residency, I did  
24 rotations in addiction. So certainly I treated  
25 many individuals on one particular unit,